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BANK OF AMERICA, N.A.

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**
16

17 ALEXIS GURSHIN, an individual,
18
19 Plaintiff,

20 vs.

21 BANK OF AMERICA, NATIONAL
ASSOCIATION; DOES 1 through X, and
22 ROE BUSINESS ENTITIES I through X,
inclusive,

23 Defendants.
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CASE NO. 2:15-cv-00323-GMN-VCF

**JOINT STIPULATION TO EXTEND
DEFENDANT'S RESPONSIVE MOTION
DEADLINES COMMENSURATE WITH
THE EXTENSIONS GRANTED TO
PLAINTIFF IN DKT. #115**

1 **Additional Plaintiff's Counsel**

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1 The parties, Plaintiff Alexis Gurshin (“Plaintiff”) and Defendant Bank of America, N.A.
2 (“Defendant” or “BANA”) (collectively, the “Parties”), through their respective attorneys of
3 record, hereby stipulate as follows:

4 **RECITALS**

5 1. On November 7, 2016, Plaintiff filed a Joint Stipulation to Extend 11/8/16 Filing
6 Deadline For Filing RFA-Related Deadlines As Ordered in ECF No. 108 and 113, For Two Days
7 (Dkt. #114), which requested that the Court extend Plaintiff’s deadline to file her response in
8 opposition to Defendant’s Motion for Order Deeming Defendant’s Second Set of Requests For
9 Admissions to Plaintiff, Or Alternatively, Compelling Responses (Dkt. #106) and her deadline to
10 file a motion to compel Defendant’s responses to Plaintiff’s Requests for Admission, from
11 11/8/2016 to 11/10/2016 due to a scheduling conflict of Plaintiff’s counsel. On November 8,
12 2016, this Court granted the request. *See* Dkt. #115.

13 2. The Parties inadvertently neglected to request a commensurate extension of
14 Defendant’s related deadlines – namely, Defendant’s 11/15/16 deadline to file a reply in support
15 of its Motion (Dkt. #106), and Defendant’s 11/15/16 deadline to oppose the anticipated motion of
16 Plaintiff to compel Defendant’s responses to Plaintiff’s Requests for Admission – deadlines which
17 were previously set by the Court in Dkts. #108 and 113, respectively. A commensurate extension
18 is necessary to afford Defendant a fair opportunity to respond to Plaintiff’s anticipated filings, as
19 originally contemplated.

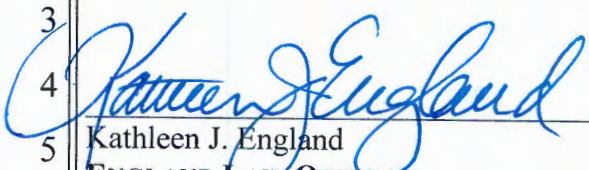
20 **STIPULATION**

21 3. NOW, THEREFORE, based on the foregoing, the Parties stipulate to request this
22 Court for a commensurate two-day extension (to November 17, 2016) for Defendant to file a reply
23 in support of its Motion (Dkt. #106) and to oppose any motion by Plaintiff to compel Defendant’s
24 responses to Plaintiff’s Requests for Admission.

1 **IT IS SO STIPULATED.**

2 Dated: November ¹⁴10, 2016

Dated: November 10, 2016

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Attorneys for Defendant BANK OF
AMERICA, N.A.

17 **IT IS SO ORDERED:**

18 DATED: 11-14-2016

19 
20 UNITED STATES MAGISTRATE JUDGE
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1 **IT IS SO STIPULATED.**

2 Dated: November 14, 2016

Dated: November 14, 2016

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AMERICA, N.A.

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15 **IT IS SO ORDERED:**

16
17 DATED: _____

UNITED STATES MAGISTRATE JUDGE